

STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARY PICKERING, as Administratrix  
of the Estate of CHARMENE  
PICKERING, Deceased,

Plaintiff,

- against -

SAMUEL MERCADO,

Defendant.

-----X  
: Addendum to  
: Protective Order

:  
: 03 Civ. 5654 (AR) (MDG )

-----X  
By the Stipulation and Protective Order approved  
by the Court on October 6, 2004 ("the Protective Order"), the  
parties, through their respective counsel, have stipulated and  
agreed that access to and use of certain information, designated  
as "Confidential Information" therein, would be restricted in  
connection with the above-captioned litigation. See Protective  
Order, annexed hereto at Tab No. 1.

By this Addendum to the Protective Order, the parties  
expressly incorporate into the definition of said "Confidential  
Information" the materials produced by defendant to plaintiff in  
answer to the plaintiff's January 11, 2005 document request for  
use by plaintiff's liability expert (hereinafter "liability  
expert production").

Accordingly, the parties hereby stipulate and agree that the provisions of the Protective Order govern the access to and use of the liability expert production.

Dated: New York, New York  
March 24, 2005

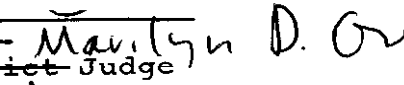
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SO ORDERED.

~~Hon. Allyne D. Ross~~   
United States ~~District~~ Judge  
Magistrate